

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

IVANA WILLIAMS

PLAINTIFF

Vs.

CAUSE NO. 3:24-cv-606-KHJ-MTP

MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY

DEFENDANT

**PLAINTIFF’S MEMORANDUM IN SUPPORT OF HER
MOTION TO EXTEND TIME FOR SERVICE**

COMES NOW, Plaintiff Ivana Williams, by and through counsel, and files this, her Memorandum in Support of Her Motion to Extend Time for Service. In support thereof, she would show unto the Court the following, to-wit:

1. The instant matter was initiated by the filing of a Complaint (Dkt. 1) on October 3, 2024. Summonses were issued the following day (Dkt. 2).
2. Prior to the filing of the Complaint and throughout the past 84 days, the parties have worked diligently towards pre-service resolution of this matter. Despite considerable effort on both sides, the parties have been unable to reach an agreement.
3. Unfortunately, a conflict has now arisen between Plaintiff and Plaintiff’s counsel. Therefore, Plaintiff’s counsel all wish to be allowed to withdraw from representation of the Plaintiff, and will seek such relief in a separate motion.
4. The current deadline for service is January 2, 2025, and the Plaintiff wishes to file an Amended Complaint prior to the service of the original Complaint.
5. In order to protect the Plaintiff’s ability to move forward with new counsel, and to allow for the orderly progression of this matter, the undersigned requests an extension of the

service deadline in this case additional 60 days, which will allow the Plaintiff time to secure new counsel and prosecute this matter as she sees fit.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff prays that this Honorable Court grant the Plaintiff's Motion to Extend Time for Service.

RESPECTFULLY SUBMITTED, this the 26th day of December, 2024.

By: /s/ J. Matthew Eichelberger
J. Matthew Eichelberger
MS Bar No. 101060
TX Bar No. 24048941
EICHELBERGER LAW FIRM, PLLC
1640 Lelia Dr, Ste 120
Jackson, MS 39216
Telephone: 601-292-7940
Facsimile: 601-510-9103

ATTORNEYS FOR THE PLAINTIFF

OF COUNSEL:

Madeline M. Iles
MS Bar No. 106186
EICHELBERGER LAW FIRM, PLLC
1640 Lelia Dr, Ste 120
Jackson, MS 39216
Telephone: 601-292-7940
Facsimile: 601-510-9103

Bobby Moak
Law Office of Bobby Moak
MS Bar No. 9915
P.O. Box 242
Bogue Chitto, MS 39629
Telephone: 601-734-2566
Email: bobbymoak402@att.net